



Federal Regulatory Affairs

2300 N St. NW, Suite 710 Washington DC 20037

www.Frontier.com

---

October 25, 2011

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> St., S.W.  
Washington, D.C. 20554

Re: *A National Broadband Plan for Our Future*, GN Docket No. 09-51; *Establishing Just and Reasonable Rates for Local Exchange Carriers*, WC Docket No. 07-135; *Developing a Unified Inter-carrier Compensation Regime*, CC Docket No. 01-92; *Connect America Fund*, WC Docket No. 10-90; *High Cost Universal Service Support*, WC Docket No. 05-337; *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45

Dear Ms. Dortch:

On October 25, 2011, Kathleen Q. Abernathy, Chief Legal Officer and Executive Vice President, Regulatory and Government Affairs, Frontier Communications, received a phone call from Zachary Katz, Chief Counsel and Senior Legal Advisor to Chairman Genachowski, to discuss the above-captioned proceedings.

Ms. Abernathy explained the benefits of the ABC Plan's proposal for recovering revenues lost as a result of intercarrier compensation reform. Under the ABC Plan, all companies that experience significant revenue shifts would be able to recover the majority of their lost revenues with a 10 percent reduction only on recovery funds derived from the Universal Service Fund. Such a system allows for recovery without overburdening any individual segment of consumers. Ms. Abernathy urged the Commission to consider this equitable manner of reform.

Pursuant to Section 1.1206(b) of the Commission's rules, 47 C.F.R. §1.1206(b), this letter is being filed electronically with your office today.

Please feel free to contact me with any further questions.

Sincerely,

A handwritten signature in blue ink, reading "Michael Saperstein, Jr." in a cursive style.

Michael D. Saperstein, Jr.  
Director of Federal Regulatory Affairs  
Frontier Communications  
(203) 614-4702

cc: Zac Katz